

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                                     |   |                            |
|-------------------------------------|---|----------------------------|
| IN RE:                              | ) | Case No.: 19-22831-CMB     |
|                                     | ) |                            |
| Paul G. Cain and                    | ) | Chapter 13                 |
| Dianne M. Cain,                     | ) |                            |
|                                     | ) |                            |
| Debtors.                            | ) | Related to Doc # Claim #17 |
|                                     | ) |                            |
| Bank of America, N.A.,              | ) |                            |
|                                     | ) | Document # _____           |
| Movant,                             | ) |                            |
|                                     | ) |                            |
| v.                                  | ) |                            |
|                                     | ) |                            |
| Paul G. Cain and Dianne M. Cain and | ) |                            |
| Ronda J. Winnecour, Ch. 13 Trustee, | ) |                            |
|                                     | ) |                            |
| Respondents.                        | ) |                            |

**DECLARATION IN RESPONSE TO NOTICE OF MORTGAGE PAYMENT CHANGE**

**AND NOW** comes the Debtors, Paul G. Cain and Dianne M. Cain, by and through their undersigned counsel, Dennis J. Spyra, Esq., and files the within Declaration in Response to Notice of Mortgage Payment Change, and in support thereof, avers as follows:

1. The undersigned has reviewed the Notice of Mortgage Payment Changes filed by Bank of America, N.A., (hereinafter "Bank of America") at Claim #17 as filed in this case, and has determined that the estate will not be adversely affected if the mortgage payment change as requested by the Bank is as allowed, **since these payments are lower than the amount allotted to Bank of America under the Plan.**
2. The new post-petition monthly mortgage payment of \$144.55, as requested by the Bank, is effective September 25, 2021, as per Notice of Modification filed by the Bank on September 2, 2021.

**WHEREFORE**, the Debtors ask this Court to allow the payment change as requested by the Bank at Claim #17 in the above-styled case and, and to grant such other and further relief as deemed necessary in furtherance of this matter.

Respectfully submitted,  
/S/ DENNIS J. SPYRA, ESQ.  
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